<u>REMARKS</u>

Reconsideration of the present application is respectfully requested.

**Summary of Amendments** 

Independent claims 1, 11, 14 and 16 have been amended, and independent

claims 18 and 20 have been canceled. Dependent claims 2-5, 8-10, 12-13, 15 and 17

have been also amended, while dependent claims 7, 19 and 21 have been canceled.

Claims 22-26 have been newly added. No new matter has been added.

**Objections** 

Claims 1-21 are objected to due to informalities. Claims 1-6 and 8-17 have

been amended accordingly. Claims 7 and 18-21 have been canceled without

prejudice. These cancelations are believed to render the objections against claims 7

and 18-21 moot.

Rejections under 35 U.S.C. §112

Claims 1-5, 12-15 and 17-21 stand rejected under 35 U.S.C. §112 due to lack of

antecedent basis. Claim 1-5, 12-15 and 17 have been amended accordingly. Claims

18-21 have been canceled without prejudice. These cancelations are believed to

render the rejections against claims 18-21 moot.

Rejections under 35 U.S.C. §101

Claims 11-15 and 20-21 stand rejected under 35 U.S.C. §101 because in

paragraph [0037] of Applicants' Specification, "computer readable medium"

includes transmission type media. Without admitting to the propriety of this

rejection, Applicants have amended paragraph [0052] of Applicants' Specification so

that "computer readable medium" does not include transmission type media.

Rejections under 35 U.S.C. §§102 & 103

The Examiner rejected claims 1-2, 6-7, 11-12 and 16-17 under 35 U.S.C. §

102(e) based on U.S. Patent Application No. 6,980,525 of Banks et al. ("Banks").

The Examiner rejected claims 3-5, 8-10, 13-14, 18 and 20 under 35 U.S.C. § 103(a)

based on Banks and U.S. Patent No. 7,230,929 of Betker et al. ("Betker").

Claim 1

Banks does not disclose or suggest, among other things, the following

limitation of claim 1:

-- assigning a common name to a pair of ports, wherein each port in the pair of ports is located on first and second FC node devices, respectively, and the

pair of ports includes a source port and a destination port --

The part of Banks cited in the Office Action, 300 of Figure 3; and col. 9, lines

21-25, does not disclose or suggest "assigning a common name to a pair of ports

which includes a source port and a destination ports." Banks focuses on a zoning

technique which divides a Fibre Channel (FC) network into several zones. The cited

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part merely discloses that a fabric administrator may assign an alias to a *zone*, and the name "host" could be used as an alias for "10:00:00:60:69:00:00:8a."

"10:00:00:60:69:00:00:8a" is a Worldwide Name for a node or port on a device, as defined in the FC protocol. Neither an alias for a zone nor an alias, "host," for "10:00:00:60:69:00:00:8a" in the cited part equals to a *common* name, *i.e.*, a shared name for *a pair of ports*, i.e., a *source port and a destination port*.

Likewise, the part of Banks cited in the Office Action, Figure 4; and col. 5, lines 36-47, does not disclose or suggest "assigning a common name to a pair of ports wherein each port in the pair of ports is located on first and second FC node devices, respectively...." This cited part generally describes labels for various ports, as defined in the FC protocol. Figure 4 generally illustrates that differently labeled ports are located on various network devices. If Bank shows that a common name is assigned to a pair of ports "wherein each port in the pair of ports is located on first and second FC node devices, respectively...," there should have been, for example, a common name for N\_port 460 and N\_port 470 or a common name for N\_port 480 and NL\_Port 492 in Figure 4. Indeed, no part of Bank discloses or suggests that a common name is assigned to a pair of ports "wherein each port in the pair of ports is located on first and second FC node devices, respectively...."

Banks also does not disclose or suggest either of the following limitations of claim 1:

-- storing the common name-to-port assignment within a name server for the FC fabric --

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-- configuring the first FC node device to query the name server to obtain an identity for the port located on the second FC node device based on the common name, and configuring the second FC node device to query the name server to obtain an identity for the port located on the first FC node device based on the common name --

The part cited in the Office Action, Figure 4; and col. 5, lines 47-65, does not show or suggest "storing the common name-to-port assignment within a name server for the FC fabric" of claim 1. This cited part provides a general description about a Simple Name Server (SMS) as defined in the FC protocol, stating, "as part of the fibre channel standard ...." (See col. 5, lines51-52 and 56 of Banks) In particular, as this cited part mentions, according the FC protocol, the SMS stores address information and attributes for *each of a plurality of ports*. Clearly, "address information and attributes of *a port*" does not equal to or include "the common name-to-port assignment," *i.e.*, "a *common* name to a *pair of ports*, wherein each port in the pair of ports is located on first and second FC node devices, respectively, and the pair of ports include a source port and a destination port."

In addition, the part cited in the Office Action, 500 of Figure 5; col. 2, lines 45-49; and col. 5, lines 58-65, does not show or suggest "configuring the first FC node device to query the name server to obtain an identity for the port located on the second FC node device *based on the common name*, and configuring the second FC node device to query the name server to obtain an identity for the port located on the first FC node device." This cited part merely describes a "zoning effect" together with a general description about an SMS defined in the FC protocol as discussed above. No part of Banks including this cited part shows or suggests that "... to

obtain an identity for the port ... based on the common name ...."

Because Banks does not disclose or suggest the above cited limitations of claim 1: "assigning a common name to a pair of ports, wherein each port in the pair of ports is located on first and second FC node devices, respectively, and the pair of ports includes a source port and a destination port"; "storing the common name-to-port assignment within a name server for the FC fabric"; and "configuring the first FC node device to query the name server to obtain an identity for the port located on the second FC node device based on the common name, and configuring the second FC node device to query the name server to obtain an identity for the port located on the first FC node device based on the common name," the § 102(e) rejection on Banks against claim 1 is thought to be overcome for at least this reason.

Claims 2-5, as amended, dependent upon claim 1 are thought to be allowable for at least this reason.

#### Claim 6

Banks does not disclose or suggest the following limitation of claim 6 as amended:

-- assigning a symbolic name to each of a plurality of FC ports, wherein each FC port is located on an FC node device, and each symbolic name is a combination of a plurality of attributes of a corresponding FC port --

The part cited in the Office Action, 300 of Figure 3; and col. 9, lines 21-25, does not show or suggest "assigning a symbolic name to each of a plurality of FC ports ... wherein ... each symbolic name is a combination of a plurality of attributes of a

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corresponding FC port." Although this cited part provides "the name "host" could be used as an alias for "10:00:00:60:69:00:00:8a" as discussed above regarding claim 1, clearly, the name "host" is not a combination of a plurality of attributes of an FC port. No part of Banks including the cited part shows or suggests that "... each symbolic name is a combination of a plurality of attributes of a corresponding FC port."

Because Banks does not disclose or suggest the limitation of claim 6, "assigning a symbolic name to each of a plurality of FC ports, wherein each FC port is located on an FC node device, and each symbolic name is a combination of a plurality of attributes of a corresponding FC port," the § 102(e) rejection on Banks against claim 6 is thought to be overcome for at least this reason.

Claims 8-10, as amended, dependent upon claim 6 are thought to be allowable for at least this reason.

## Claims 11 and 16

Banks does not disclose or suggest the following limitation of claim 11 as amended:

-- querying a name server for the FC fabric to obtain an FC identity for the second port, based on a match of a symbolic name of the first FC port and a symbolic name of the second FC port, wherein the first and second FC ports are located on first and second FC node devices, respectively, and the symbolic names are stored within the name server --

In particular, Banks does not disclose or suggest, among other things,

"querying a name server for the FC fabric to obtain an FC identity for the second

port, based on a <u>match</u> of a symbolic name of the first FC port and a symbolic name of the second FC port ...."

Banks merely provides a general description about an SMS as defined in the FC protocol as discussed above regarding claim 1; an SMS stores address information and attributes of ports on its FC network. (See col. 5, lines 48-65, cited in the Office Action) Indeed, no part of Banks discloses or suggests "... to obtain an FC identity for the second port, based on a match of a symbolic name of the first FC port and a symbolic name of the second FC port ...."

Because Banks does not disclose or suggest the limitation of claim 11, "querying a name server for the FC fabric to obtain an FC identity for the second port, based on a match of a symbolic name of the first FC port and a symbolic name of the second FC port, wherein the first and second FC ports are located on first and second FC node devices, respectively, and the symbolic names are stored within the name server," the § 102(e) rejection on Banks against claim 11 is thought to be overcome for at least this reason.

Independent claim 16, as amended, contains substantially the same limitations as discussed above regarding claim 11. Therefore, independent claims 11 and 16 and all claims dependent upon these independent claims are thought to be allowable for at least this reason.

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### Claim 14

Claim 14, as amended, contains substantially the same limitations as discussed above regarding claim 11. Therefore, Banks does not disclose or suggest these limitations of claim 14 as discussed above regarding claim 11.

Like Banks, no part of Betker discloses or suggests those limitations of claim 14. The part cited in the Office Action, col. 4, lines 31-33 of Betker, merely provides general information about FC-4, one of Fibre Channel ANSI standards, as follows: "FC-4 provides mapping between lower levels of fibre channel, IPI and SCSI commands sets, HIPPI data framing, IP and other upper level protocols."

Because neither Banks nor Betker discloses or suggests the limitations of claim 14, which are substantially same as discussed above regarding claim 11, any combination of Banks and Betker cannot disclose or teach the whole limitations of claim 14.

Claim 15 dependent upon claim 14 is thought to be allowable for at least this reason.

#### Claim 22

Newly added claim 22 recites:

A method for creating a link from a first Fibre Channel (FC) node device to a second FC node device on an FC fabric having a name server for the FC fabric, the method comprising:

querying the name server to retrieve a plurality of values for a symbolic name field within a name server database for the name server;

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searching the plurality of values received from the name server for a combination of a plurality of attributes of the second FC node device; and

creating the link from the first FC node device using an FC identifier for the second FC node device, wherein the FC identifier is obtained from the name server, and the second FC node device has the combination as a value for its symbolic name field.

Like all the other independent claims, claim 22 deals with creating a link between FC node devices over an FC network. According to the method of claim 22, to create a link, a first FC node device obtains an FC identifier for a second FC node device by "querying the name server to retrieve a plurality of values for a *symbolic* name field ..." and "searching the plurality of values ... for a combination of a plurality of attributes of the second FC node device."

Both Banks and Betker fail to disclose or suggest, among other things, those two operations of claim 22. Banks, as mentioned before, simply provides general information about an SNS as defined in the FC protocol. No part of Banks including the cited parts in the Office Action discloses or suggests "searching a plurality of values for a symbolic name field stored in a name server for an FC fabric for a combination of a plurality of attributes of a destination FC node device." Meanwhile, Betker deals with a configuration of a multi-module fabric switch. Clearly, Betker does not disclose or suggest those two limitations of claim 22.

Because neither Banks nor Betker discloses or suggests both "querying the name server to retrieve a plurality of values for a symbolic name field as defined in the FC protocol within a name server database for the name server"; and "searching the plurality of values received from the name server for a combination of a

plurality of attributes of the second FC node device," claim 22 is thought to be allowable over Banks or Betker or any combination of Banks and Betker.

Newly added claims 23-26 dependent upon claim 22 are thought to be allowable for at least this reason.

Applicants have not necessarily discussed here every reason why every pending independent claim is patentable over the cited art; nonetheless, Applicants are not waiving any argument regarding any such reason or reasons. Applicants reserve the right to raise any such additional argument(s) during the future prosecution of this application, if Applicants deem it necessary or appropriate to do so.

# Conclusion

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

If there are any additional charges/credits, please charge/credit our Deposit Account No. 02-2666.

Respectfully submitted,

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